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September 7, 2022

VIA ECF

Hon. Mae A. D'Agostino
United States District Judge
Northern District of New York
445 Broadway
Albany, New York 12207

Re: United States v. Ingrao, et al., 1:21-CR-343 (MAD) (NDNY)

Dear Judge D'Agostino:

I am writing on behalf of all defendants and without objection from the government to respectfully request that the deadline for the defendants to file their pretrial motions in this case be extended by 45 days, from September 19, 2022 to November 3, 2022. The additional time that we seek will have no impact on the April 2023 trial date and will permit the defendants to work together to coordinate and streamline their motions so as to avoid any duplicative efforts.

Thank you for the Court's consideration on this request. We remain available for a conference on this matter should Your Honor deem it necessary.

Respectfully submitted,


Jeffrey Lichtman

cc: Michael Barnett, Esq.
Assistant United States Attorney

All defense counsel